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September 16, 2020

Hon. Brian R. Martinotti  
United States District Judge  
United States Courthouse  
402 East State Street  
Trenton, N.J. 08608

Re: U.S. v. Steven Bradley Mell,  
Civ. No. 20-2277 (BRM)  
Crim. No. 18-757 (BRM)

Dear Judge Martinotti:

We respectfully request an extension of our time to file (1) a Supplemental Memo in Support of Mr. Mell's § 2255 motion; and (2) a Supplemental Memo in Support of Mr. Mell's § 3582 Motion for Compassionate Release, until October 7, 2020. On August 25, 2020, your Honor granted our request for an extension of time until this Friday, September 18, 2020 (DE 93 in 18 Cr. 757). On September 9, we received a large volume of discovery that had previously been provided to Mr. Mell in his New Jersey State case, and on September 14 we received an additional, substantial transfer of files from Mr. Mell's prior counsel, Mr. Bianchi, who has been entirely cooperative with the undersigned. We are reviewing these files diligently and have contacted Allenwood to request a privileged telephone call with Mr. Mell to finalize our papers.

We of course do not object to similar extensions on behalf of the Government, to respond to our supplemental memos once filed. Thank you for considering this request.

Respectfully submitted,



Richard Levitt  
*Attorney for Steven Bradley Mell*

cc: Anthony Bianchi, Esq. (by email to: rbianchi@bianchilawgroup.com)  
David Bruno, Esq. (by email to dbruno@bianchilawgroup.com)  
(All counsel of record – via ECF)

"SO ORDERED."



Date: 9/16/2020

Brian R. Martinotti, U.S.D.J.